

## Comments on RM-10787

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In the matter of RM-10787

I shall comment on excerpts from RM-10787

*“...the VECs overwhelmingly agreed....”*

The ARRL, which accounts for 70 percent of all exams given annually, is NOT a signatory to RM-10787. Use of the word “overwhelming” is misleading.

*“countries have already begun discontinuing Morse exams”*

It should be noted that, as of this writing, only five of all the countries of WRC have discontinued Morse testing, a small minority. The decision at WRC-03 does NOT recommend the elimination of Morse examinations, it simply offers the choice to each individual regulatory agency. Thus this argument carries little merit.

*“the International Maritime Organization adopted the Global Marine Distress and Safety System (GMDSS)”*

This information is often cited in the argument against the use of Morse but it should be noted that the abandonment of Morse use by the military is due to their access to a billion dollar high-tech satellite based system. Amateurs have no access to such systems so this argument is without merit and should not be considered.

*“The amateur radio operator examination process does not require a practical demonstration in the ability to use any other mode.”*

As a VE Liaison with ARRL I am able to review the various current elements in use for exam purposes. I have found questions regarding a

number of modes, RTTY, AMTOR and packet for example. This seems to render this statement false and not worthy of consideration

*“Experience has shown that it is more often than not a very stressful experience for the examinee.”*

It is obvious that ANY exam could be stressful. Is that an excuse to eliminate the exam? Should we eliminate the SATs or driver license exams, for example, just because they are stressful?. It is obvious that this argument is unconvincing and should not be considered.

*”....demonstrate this antiquated skill.”*

This wording was clearly chosen to give the impression that Morse is a mode not in use today. In fact, just the opposite is true. In a recent survey of operating preferences conducted by the ARRL with 3073 responses only 32.6 percent said they never use code. Of the remaining respondents 44 percent indicate code is their primary mode. It is clear that this “antiquated” mode is still in use today by a majority of amateur operators. This misinformation should not be considered.

*“The administration of a CW examination imposes an unnecessary burden on the VE teams....”*

I hold credentials from three VECs and NONE of them has ever surveyed myself or any of the VEs with whom I have spoken. How do they suppose to speak for the VEs when they haven’t asked them if the CW examination is a burden or not? Speaking for the 15 VEs on my very active VE team the CW examinations are NOT a burden. Since this argument seems to have no foundation in fact it is unconvincing and should not be considered.

*“....unsettling to other examinees who are taking one of the written examinations within the same room.”*

This is true if it was widespread but I believe our team is a good example of practices that are generally in use. If it is necessary to confine all examinees to a single room we use headphones for the CW examinations. Normally we have access to a separate room for the Morse examinations. This argument has little merit.

In summary, the words of those who initiated RM-10787 actually support the retention of Morse testing when they say:

*“In short, the Commission should ensure that the amateur examination elements are appropriate for the types of operation that will be performed by the licensee.”*

As long as Morse code continues to be an authorized mode of amateur communications it should remain an examination element. The specific set of skills required for operation of this mode should be demonstrated by those who will be authorized to use it.

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